

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov

In re: CASE NO. 6:15-bk-03459-CCJ
TIRECO, INC., CHAPTER 11
Debtor.

VERIFIED STATEMENT PURSUANT TO RULE 2014 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE IN SUPPORT OF APPLICATION OF TIRECO,
INC., TO EMPLOY JUSTIN M. LUNA AND THE LAW FIRM OF LATHAM,
SHUKER, EDEN & BEAUDINE, LLP,
AS DEBTOR'S COUNSEL, NUNC PRO TUNC TO APRIL 21, 2015

I, Justin M. Luna, in accordance with F.R.B.P. 2014, make the following verified statements in support of the Application of Tireco, Inc., to Employ Justin M. Luna and the Law Firm of Latham, Shuker, Eden & Beaudine, LLP, as Debtor's Counsel, *nunc pro tunc* to April 21, 2015 ("Application"):

1. I am a partner with the firm of Latham, Shuker, Eden & Beaudine, LLP ("Latham Shuker"), and have been duly admitted to practice in this Court.
2. Latham Shuker was retained by the Debtor on or about August 2014 and has kept current on its bills and has not received any preferential payments as defined in 11 U.S.C. § 547.
3. To the best of my knowledge, Latham Shuker has no connection with the creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any persons employed by the United States Trustee.
4. Latham Shuker is not a creditor of the Debtor.

5. Except as stated below, Latham Shuker does not represent, the individual interests of any other officer, director, or shareholder of the Debtor. Latham Shuker previously represented J. Michael Jones and Monica Jones, individually, as well as the Debtor, in the foreclosure action brought in 18th Circuit Court in and for Seminole County, Florida by TD Bank, N.A., Case No. 2014-CA-002097-14C-W ("TD Bank Action").

6. The undersigned is not aware of any conflict or potential conflict relating to the employment of Latham Shuker as counsel for Debtor-in-Possession in this case, does not hold any interest adverse to the Debtor's estate; and believes it is a "disinterested person" as defined within § 101(14) of the Bankruptcy Code.

7. Latham Shuker has no connection with the U.S. Trustee's office or any person employed at the U.S. Trustee's office. Partners and associates of Latham Shuker have dealt with the U.S. Trustee's office in other cases and have social contact with various attorneys of the U.S. Trustee's office.

8. The factual statements set forth in this verified statement have been made based on (1) a personal review by me and my staff of the list of creditors of the Debtor, (2) a computer search of Latham Shuker's client list, and (3) a memorandum circulated to all of Latham Shuker's attorneys requesting information as to whether a conflict would exist if this representation were undertaken. These efforts did not reveal any conflicts.

I verify, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

DATED AND EXECUTED this 1st day of May 2015.



Justin M. Luna

Florida Bar No. 037131

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LATHAM, SHUKER, EDEN & BEAUDINE, LLP

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Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
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In re:

CASE NO. 6:15-bk-03459-CCJ

TIRECO, INC.,

CHAPTER 11

Debtor.

_____ /

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the **VERIFIED STATEMENT PURSUANT TO RULE 2014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE IN SUPPORT OF APPLICATION OF TIRECO, INC., TO EMPLOY R. JUSTIN M. LUNA AND THE LAW FIRM OF LATHAM, SHUKER, EDEN & BEAUDINE, LLP, AS DEBTOR'S COUNSEL, *NUNC PRO TUNC* TO APRIL 21, 2015**, together with any exhibits, has been furnished either electronically and/or by U.S. First Class, postage prepaid mail to: Tireco, Inc., Attn: Monica Jones, 2600 W SR 434, Longwood, FL 32779; Michael A. Nardella, Esq., a/f TD Bank N.A., Burr & Forman LLP, 200 S. Orange Avenue, Suite 800, Orlando, Florida 32801 ; the 1007-2 Parties-in-Interest list, as shown on the matrix attached to the original of this statement filed with the Court; and the U.S. Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801, this 1 day of May 2015.



Justin M. Luna, Esq.

Label Matrix for local noticing
113A-6
Case 6:15-bk-03459-CCJ
Middle District of Florida
Orlando
Fri May 1 11:01:57 EDT 2015

Tireco, Inc
2600 West State Road 434
Longwood, FL 32779-4446

Advanced Auto Parts
P.O. Box 742063
Atlanta, GA 30374-2063

Bank of America
P.O. Box 660807
Dallas, TX 75266-0807

Bridgestone Americas
P.O. Box 730529
Dallas, TX 75373-0529

Don Reid Ford
1875 S. Orlando Ave.
Maitland, FL 32751-6668

Duke Energy
P.O. Box 1004
Charlotte, NC 28201-1004

Greenway Dodge Chrysler Jeep
9051 E. Colonial Drive
Orlando, FL 32817-4176

Holler Honda
P.O. Box 1720
Winter Park, FL 32790-1720

Radiator Depot
P.O. Box 3497
Kansas City, KS 66103-0497

Securities Exchange Commission
175 West Jackson Street
Suite 900
Chicago IL 60604-2908

Seminole City Water & Sewer
P.O. Box 958443
Lake Mary, FL 32795-8443

TCI
P.O. Box 742237
Atlanta, GA 30374-2237

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TWW
P.O. Box 905944
Charlotte, NC 28290-5944

Waste Management, Inc. of FL
P.O. Box 105453
Atlanta, GA 30348-5453

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400 W. Washington Street
Suite 1100
Orlando, FL 32801-2440

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Christopher R Thompson +
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Orlando, FL 32801-2367

Note: Entries with a '+' at the end of the
name have an email address on file in CMECF

End of Label Matrix
Mailable recipients 22
Bypassed recipients 0
Total 22